

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

AVM TECHNOLOGIES, LLC,	)	
	)	
Plaintiff,	)	
	)	C.A. No. 10-610-PD
v.	)	
	)	
INTEL CORPORATION,	)	
	)	
Defendant.	)	

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL**

Pursuant to Rule 83.7 of the Local Rules of Civil Practice and Procedure of the United States District Court for the District of Delaware, counsel with the firms of Covington & Burling LLP and Ashby & Geddes hereby move the Court for leave to withdrawal as counsel for AVM Technologies, LLC (“AVM”), and in support thereof state the following:

1. Basis for the Motion. The basis for the motion is that the relationship between AVM and moving counsel has deteriorated to the extent that AVM and moving counsel no longer believe that moving counsel can remain involved in this litigation and satisfy their professional obligations to AVM.

2. Notice to Client. Pursuant to Local Rule 83.7, moving counsel have provided a copy of this motion to AVM by certified mail addressed to the AVM’s last known address. It is our understanding that AVM does not oppose this motion.

3. Continued Representation. Moving counsel have reviewed the substance of this motion with AVM’s remaining counsel of record, Matthew C. Lapple, and have reviewed with him the requirement that AVM also be represented by a member of the Bar of this Court. Mr. Lapple plans to file a motion on AVM’s behalf seeking a brief stay of the litigation to allow AVM to retain new counsel. Such motion will be forthcoming. Moving counsel previously have requested that defendant Intel consent to such a stay, but Intel refused.

ASHBY & GEDDES

*/s/ John G. Day*

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Dated: April 14, 2011

**CERTIFICATION PURSUANT TO LOCAL RULE 7.1.1.**

I hereby certify that counsel for plaintiff made a reasonable effort to reach agreement on the attached motion with counsel for defendant, but that no agreement could be reached.

*/s/ John G. Day*

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John G. Day

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	)	
Defendant.	)	

**ORDER**

This \_\_\_\_ day of \_\_\_\_\_, 2011, the court having heard and considered the motion for leave to withdraw as counsel and having found the motion should be granted,

IT IS ORDERED the motion is granted and the entries of appearance of the following counsel are withdrawn in this matter: for Ashby & Geddes, John G. Day (I.D. #2403), Lauren E. Maguire (I.D. #4261), Andrew C. Mayo (I.D. #5307), and for Covington & Burling, Robert T. Haslam, Holly Baudler, Paul J. Berman, Roderick R. McKelvie, Richard L. Rainey, Paul A. Ainsworth, Alexander D. Chinoy, Paul J. Wilson, and Heidi M Gutierrez

\_\_\_\_\_  
Paul S. Diamond, J.